

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**APRIL 2015 GRAND JURY
(Impaneled 4/13/15)**

THE UNITED STATES OF AMERICA

-vs-

**SECOND
SUPERSEDING
INDICTMENT
14-CR-6123-EAW**

BRANDON CORREA

Violations:
Title 18, United States Code,
Sections 871 and 875(c)
(7 Counts)

COUNT 1

(Making a Threat Against the President)

The Grand Jury Charges That:

On or about June 11, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon, the President of the United States, that is, the defendant posted an online message using the online social network service Twitter directed to President Barack Obama in which the defendant wrote "Get ready to die faggot" and "You are a marked bitch...Im coming to watch you die".

All in violation of Title 18, United States Code, Section 871.

COUNT 2
(Threat by Interstate Communication)

The Grand Jury Further Charges That:

On or about June 11, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully transmit in interstate commerce a communication, that is, an online posting using the online social network service Twitter directed to the Governor of the State of New York, and the communication contained a threat to injure the Governor of the State of New York, specifically, the defendant posted "You owe faggot...get ready to die...BAPHOMET sent me" and "Get ready to die".

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3
(Threat by Interstate Communication)

The Grand Jury Further Charges That:

On or about June 11, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully transmit in interstate commerce a communication, that is, an online posting using the online social network service Twitter directed to the Lieutenant Governor of the State of New York, and the communication contained a threat to injure the Lieutenant Governor of the State of New York, specifically, the defendant posted "Get ready to die".

All in violation of Title 18, United States Code, Section 875(c).

COUNT 4
(Making a Threat Against the President)

The Grand Jury Further Charges That:

On or about August 7, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon, the President of the United States, that is, the defendant posted an online message using the online social network service Twitter directed to President Barack Obama in which the defendant wrote "GET READY to DIE Barack Obama".

All in violation of Title 18, United States Code, Section 871.

COUNT 5
(Threat by Interstate Communication)

The Grand Jury Further Charges That:

On or about August 7, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully transmit in interstate commerce a communication, that is, an online posting using the online social network service Twitter directed to the Governor of the State of New York, and the communication contained a threat to injure the Governor of the State of New York, specifically, the defendant posted "GET READY to DIE Governor Andrew Cuomo".

All in violation of Title 18, United States Code, Section 875(c).

COUNT 6
(Threat by Interstate Communication)

The Grand Jury Further Charges That:

On or about August 7, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully transmit in interstate commerce a communication, that is, an online posting using the online social network service Twitter directed to the Lieutenant Governor of the State of New York, and the communication contained a threat to injure the Lieutenant Governor of the State of New York, specifically, the defendant posted “GET READY to DIE Robert Duffy (politician)”.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 7
(Threat by Interstate Communication)

The Grand Jury Further Charges That:

On or about August 7, 2014, in the Western District of New York, and elsewhere, the defendant, BRANDON CORREA, did knowingly and willfully transmit in interstate commerce a communication, that is, an online posting using the online social network service Twitter directed to the Mayor of the City of Rochester, and the communication contained a threat to injure the Mayor of the City of Rochester, specifically, the defendant posted “TELL Mayor Lovely GET READY to DIE”.

All in violation of Title 18, United States Code, Section 875(c).

DATED: Rochester, New York, July 28, 2015.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

/s/Foreperson
FOREPERSON